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10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **LOS ANGELES DIVISION**

13 In re:

14 CRESTLLOYD, LLC,

15 Debtor and Debtor in Possession.

Case No.: 2:21-bk-18205-DS

Chapter 11 Case

16 **DEBTOR'S NOTICE OF MONTHLY FEE**
17 **STATEMENT OF SIERRACONSTELLATION**
18 **PARTNERS, LLC**

19 [October 26, 2021 (the Petition Date) – October 31, 2021]

20 [No Hearing Required, Unless Timely Opposition and
21 Request for a Hearing is Filed]

1 **PLEASE TAKE NOTICE** that, (A) on October 28, 2021, Crestlloyd, LLC, the Chapter
2 11 debtor and debtor in possession herein (the “Debtor”), filed a *Notice of Setting/Increasing Insider*
3 *Compensation* (the “Notice of Insider Compensation”) for SierraConstellation Partners LLC/Lawrence
4 R. Perkins (“SCP”) and served it on the UST and other parties, (B) on November 16, 2021, the United
5 States Trustee (the “UST”) filed its *Objection To Notice Of Insider Compensation* (the “Objection”)
6 [Dkt. 35] objecting to SCP’s Notice of Insider Compensation, (C) on December 13, 2021, the Debtor
7 filed its *Stipulation [With the UST] (1) Resolving UST Objection To Notice Of Insider Compensation*
8 *And (2) Vacating Hearing Thereon* (the “Insider Compensation Stipulation”) [Dkt. 72], (D) on
9 December 16, 2021, the Court entered its *Order Approving Stipulation [With the UST] (1) Resolving*
10 *UST Objection To Notice Of Insider Compensation And (2) Vacating Hearing Thereon* (the “Insider
11 Compensation Order”) [Dkt. 77].

12 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation
13 Stipulation and Insider Compensation Order, “SCP must file monthly fee statements [each a “Fee
14 Statement”] and serve the UST therewith, and, absent an objection by the UST or some other party in
15 interest within seven (7) days thereafter, the fees and costs may be paid in full. In the event of an
16 objection, the undisputed portion may be paid without prejudice to the balance subject to order of the
17 Court.”

18 **PLEASE FURTHER TAKE NOTICE THAT**, consistent with the foregoing procedure,
19 on December 12, 2021, the Court entered its *Interim Order* [the “DIP Order” [Dkr. 70]] *Granting*
20 *Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant*
21 *To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And*
22 *Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief* [the “DIP Motion”]
23 [Dkt. 66]], which, *inter alia*, granted the DIP Motion on an interim basis and approved the terms of the
24 DIP Loan Documents,¹ which provide, among other things, that:

25 Loan Proceeds shall be used solely in accordance with the Budget,
26 including for payment of the Facility Fee, Lender's reasonable
27 attorneys’ fees and costs incurred in making and documenting the
28 Loan, title insurance premiums, escrow fees, the Extension Fee,

¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the DIP Motion.

1 and the Carve Out and Borrower's working capital needs and to
2 administer the Chapter 11 Case, including insurance, repair,
3 maintenance and construction costs with respect to the Property.
4 With respect to the fees and costs of the Manager of the Debtor
5 [i.e., SCP], Manager [i.e., SCP] shall file monthly fee statements
6 and, absent an objection within seven (7) days thereafter, the fees
7 and costs may be paid in full. In the event of an objection, the
8 undisputed portion may be paid without prejudice to the balance
9 subject to order of the Court.

10 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation
11 Stipulation, Insider Compensation Order, DIP Motion, and DIP Order, SCP hereby files its Fee
12 Statement for the period from October 26, 2021 (the Petition Date) through and including October 31,
13 2021. SCP reserves its right to supplement, amend, or modify the Fee Statement to include fees
14 and/or expenses incurred during the foregoing period not covered in the attached Fee Statement or
15 incurred subsequent to October 31, 2021.

16 Annexed as **Exhibit "A"** hereto is the name of each professional who performed services
17 for the Debtor in connection with this chapter 11 case during the period covered by this Fee Statement
18 and the hourly rate and total fees for each professional during such period.

19 Annexed as **Exhibit "B"** hereto is the summary of hours in this Fee Statement broken up
20 by partner and task.

21 Annexed as **Exhibit "C"** hereto are the detailed time entries for the period covered by this
22 Fee Statement.

23 Annexed as **Exhibit "D"** hereto is the summary of expenses included in this Fee
24 Statement.

25 Annexed as **Exhibit "E"** hereto are the detailed entries for the expenses covered by this
26 Fee Statement.

27 **PLEASE TAKE FURTHER NOTICE that objections, if any, to this Fee Statement**
28 **must be filed with the Court and served so as to be received by the undersigned counsel to the**
Debtor no later than seven (7) days after the filing of this Fee Statement.

PLEASE TAKE FURTHER NOTICE that, (A) if no objection is properly and timely filed and served in accordance with the above procedures, the Debtor will pay SCP the fees and expense set forth in this Fee Statement (provided such payment is consistent with the Budget) and (B) if an objection is properly and timely filed and served in accordance with the above procedures, (1) the Debtor will pay SCP the undisputed portion of fees and expenses set forth in this Fee Statement (provided such payment is consistent with the Budget) and (2) any disputed portion of fees and expenses set forth in this Fee Statement shall be subject to review and further order by the Court.

Dated: January 24, 2022

CRESTLLOYD, LLC

/s/ Todd M. Arnold

DAVID B. GOLUBCHIK

TODD M. ARNOLD

LEVENE, NEALE, BENDER, YOO

& GOLUBCHIK L.L.P.

Attorneys for Debtor and Debtor in Possession

EXHIBIT “A”

Summary of SierraConstellation Partners Professional Fees by Consultant

For the Period October 26th through October 31st

<u>Consultant</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
Lawrence Perkins	CEO	\$790	12.4	\$9,796.00
Miles Staglik	Senior Director	\$580	5.4	\$3,132.00
Rob Schenfeld	Director	\$525	0.4	\$210.00
Rodrigo Verseda	Associate	\$235	29.2	\$6,862.00
			47.4	\$20,000.00

EXHIBIT “B”

Summary of SierraConstellation Partners Professional Fees by Activity

For the Period October 26th through October 31st

<u>Activity / Consultant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
<u>Asset Sales/Financing Process Support</u>				
Lawrence Perkins	CEO	1.00	\$790	\$790
	<i>Activity Total</i>	1.00		\$790
<u>Business Operations, Cash Management & CRO Support</u>				
Lawrence Perkins	CEO	11.40	\$790	\$9,006
Rob Schenfield	Director	0.40	\$525	\$210
	<i>Activity Total</i>	11.80		\$9,216
<u>Case Administration</u>				
Miles Staglik	Senior Director	5.40	\$580	\$3,132
Rodrigo Virseda	Associate	29.20	\$235	\$6,862
	<i>Activity Total</i>	34.60		\$9,994

EXHIBIT “C”

Summary of Sierra Constellation Partners Professional Fees by Professional Service

For the Period October 26th through October 31st

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Sales/Financing Process Support				
<i>Lawrence Perkins</i>				
10/26/2021	Meeting with potential DIP lender/buyer of property	1.00	\$790.00	\$790.00
Business Operations, Cash Management & CRO Support				
<i>Lawrence Perkins</i>				
10/26/2021	Call with potential dip lender and correspondence with same	0.50	\$790.00	\$395.00
10/26/2021	Various calls with press re: outreach on filing	1.20	\$790.00	\$948.00
10/26/2021	Review of applications for employment; comments and signature re: same	0.70	\$790.00	\$553.00
10/26/2021	Review of 7 Day package requirement	0.50	\$790.00	\$395.00
10/26/2021	Calls with insurance brokers	0.50	\$790.00	\$395.00
10/26/2021	Call with counsel re: various workstreams	0.50	\$790.00	\$395.00
10/27/2021	Call with insurance brokers re: policy	0.50	\$790.00	\$395.00
10/27/2021	Call with lender	0.50	\$790.00	\$395.00
10/27/2021	Meeting at property	1.00	\$790.00	\$790.00
10/27/2021	Discussion with counsel re: strategy post visit	0.50	\$790.00	\$395.00
10/28/2021	Call with owner re: status of property	0.50	\$790.00	\$395.00
10/28/2021	Review of various analyses and calls with deal team	1.00	\$790.00	\$790.00
10/28/2021	Correspondence with lender	0.70	\$790.00	\$553.00
10/28/2021	Calls with potential brokers	1.20	\$790.00	\$948.00
10/29/2021	Review of RFP and distribution to brokers	1.20	\$790.00	\$948.00
10/29/2021	Call with lender	0.40	\$790.00	\$316.00
Lawrence Perkins Total				\$9,006.00
<i>Rob Schenfeld</i>				
10/28/2021	Update call with Miles Staglik re: background to filing	0.40	\$525.00	\$210.00
Rob Schenfeld Total				\$210.00
Case Administration				
<i>Rodrigo Virseda</i>				
10/26/2021	Reviewing debtor information and Ch 11 forms provided by D.Witkins and LNBYG; Gathering critical information to complete the 7-Day package	1.00	\$235.00	\$235.00
10/27/2021	Gathering critical information to complete the 7-Day package; working on DIP budget model	8.40	\$235.00	\$1,974.00

10/27/2021	Preparation for and call with LNBYG, Lockton and L. Perkins to discuss insurance coverage	0.50	\$235.00	\$117.50
10/27/2021	Preparation for and call with LNBYG and Skyline Dev to discuss status of 7-Day Package	0.50	\$235.00	\$117.50
10/28/2021	Call with EFO Financial Group re: DIP Financing	0.50	\$235.00	\$117.50
10/28/2021	Teleconference with M. Staglik on case status, DIP, bank accounts and Insurance	0.90	\$235.00	\$211.50
10/28/2021	Reviewing information on debtor provided, working on DIP budget model and gathering information for 7-Day Package.	9.60	\$235.00	\$2,256.00
10/29/2021	Working on DIP budget model and gathering information for 7-Day Package	3.60	\$235.00	\$846.00
10/31/2021	Working on DIP budget model and gathering information for 7-Day Package	4.20	\$235.00	\$987.00

Rodrigo Virseda Total	\$6,862.00
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Miles Staglik

10/28/2021	Teleconference with R. Virseda on case status, DIP, bank accounts and Insurance	0.90	\$580.00	\$522.00
10/29/2021	Review materials and first day filings	3.00	\$580.00	\$1,740.00
10/30/2021	Review documents and initial DIP budget	1.50	\$580.00	\$870.00

Miles Staglik Total	\$3,132.00
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EXHIBIT “D”

Summary of SierraConstellation Partners Expenses by Category

For the Period October 26th through October 31st

<u>Reimbursable Expenses</u>	<u>Amount</u>
Miscellaneous (Postage and Shipping)	\$70.85
<u>Total Expenses</u>	<u>\$70.85</u>

EXHIBIT “E”

Summary of SierraConstellation Partners Expenses by Detail

For the Period October 26th through October 31st

<u>Activity</u>	<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
Miscellaneous				
	10/26/2021	Perkins Lawrence	Postage and Shipping	\$70.85
Total Miscellaneous				\$70.85
			Total Expenses	\$70.85

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90017.

A true and correct copy of the foregoing document entitled **DEBTOR'S NOTICE OF MONTHLY FEE STATEMENT OF SIERRACONSTELLATION PARTNERS, LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 24, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kyra E Andrassy kandrassy@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Todd M Arnold tma@lnbyg.com
- Jerrold L Bregman jlbregman@bg.law, ecf@bg.law
- Marguerite Lee DeVoll mdevoll@watttieder.com
- Danielle R Gabai dgabai@danninggill.com
- Thomas M Geher tmg@jmbm.com, bt@jmbm.com;fc3@jmbm.com;tmg@ecf.inforuptcy.com
- David B Golubchik dbg@lnbyg.com, stephanie@lnbyb.com
- James Andrew Hinds jhinds@hindslawgroup.com;mduran@hindslawgroup.com, mduran@hindslawgroup.com
- Robert B Kaplan rbk@jmbm.com
- Jane G Kearl jkearl@watttieder.com
- Jennifer Larkin Kneeland jkneeland@watttieder.com
- Michael S Kogan mkogan@koganlawfirm.com
- Noreen A Madoyan Noreen.Madoyan@usdoj.gov
- Ryan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
- Sharon Oh-Kubisch sokubisch@swelawfirm.com, gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com
- Victor A Sahn vsahn@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;vsahn@ecf.inforuptcy.com;cblair@sulmeyerlaw.com;cblair@ecf.inforuptcy.com
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- David Seror dseror@bg.law, ecf@bg.law
- Zev Shechtman zshechtman@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com
- Mark Shinderman mshinderman@milbank.com, dmuhrez@milbank.com;dlbatie@milbank.com
- Lindsey L Smith lls@lnbyb.com, lls@ecf.inforuptcy.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Jessica Wellington jwellington@bg.law, ecf@bg.law

2. SERVED BY UNITED STATES MAIL: On **January 24, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 24, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 24, 2022
Date

Lourdes Cruz
Printed Name

/s/ Lourdes Cruz
Signature

In re Crestlloyd, LLC
D UST Receiver RSN + Amended 20
Largest
File No.: 9562

Debtor
Crestlloyd, LLC
c/o SierraConstellation Partners LLC
355 S. Grand Avenue Suite 1450
Los Angeles, CA 90071

Noreen A Madoyan
Office of the United States Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, CA 90017

Counsel For Receiver
Brutzkus Gubner Rozansky Seror
Weber LLP
David Seror/Jessica Wellington
21650 Oxnard Street, Suite 500
Woodland Hills, CA 91367

Biabani & Associates, Inc.
Attn: Alex Biabani
1600 Sawtelle Bl #104
Los Angeles, CA 90025

Bradford Sheet Metal
4164 Sopp Road
Mojave, CA 93501

Branden Williams
257 N. Cannon Dr., 2nd Fl.
Beverly Hills, CA 90210

C.G.S. Custom Glass Specialists
Attn: Tom Yang
4536 Ish Drive
Simi Valley, CA 93063

CAD Stone Works Inc.
Attn: Cesar Hernandez
4533 Van Nuys Bl. #201
Sherman Oaks, CA 91403

Centurion Air, LLC
Attn: Michael T. Pyle
13932 Arrow Creek Road
Draper, UT 84020

Davidson Accountancy Corp.
William N. Davidson, CPA
14011 Ventura Blvd., Ste. 302
Sherman Oaks, CA 91423

Creative Art Partners
6542 Hayes Dr.
Los Angeles, CA 90048

Italian Luxury Design
4 NE 39 St.
Miami, FL 33137

Jabs Pools and Spas, LLC
Attn: Georgina Rendon
8055 Matilija Ave.
Panorma City, CA 91402

Dennis Palma
146 Beach Way
Monterey, CA 93940

KN Coating
201 E. Tamarack Ave
Inglewood, CA 90301

LA DWP
P.O. Box. 30808
Los Angeles, CA 90030

Vesta (aka Showroom Interiors, LLC)
Attn: Julian Buckner
8905 Rex Road
Pico Rivera, CA 90660

Made by TSI, Inc.
888 Biscayne Blvd #209
Miami, FL 33132

Midland Contractors, Inc.
Attn: Bruce Partovi
Po Box 8312
Van Nuys, CA 91409

West Valley Green Landscaping, Inc.
14761 Tupper St.
Panorama City, CA 91402

The Vertex Companies, Inc.
12100 Wilshire Blvd 8th floor
Los Angeles CA 90025-0000

West Coast Gates
339 Isis Ave.
Inglewood, CA 90301